

1 Martha G. Bronitsky
Chapter 13 Standing Trustee
2 Po Box 5004
3 Hayward,CA 94540
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5 UNITED STATES BANKRUPTCY COURT
6 NORTHERN DISTRICT OF CALIFORNIA
7 OAKLAND DIVISION

8 In re 9 Wali As-Saboor Muhammad 10 debtor(s)	Chapter 13 Case No. 15-41972-CN 13
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11 **Trustee's Motion and Declaration to**
12 **Dismiss or Convert Proceedings for Case Deficiencies and Notice Thereon**

13 TO DEBTOR(S) AND DEBTOR(S)' ATTORNEY OF RECORD:

14 Martha G. Bronitsky, Chapter 13 Standing Trustee, hereby moves the court for an Order Dismissing
15 or converting this case for cause pursuant to 11 U.S.C. §1307(c) based on unreasonable delay that it is
16 prejudicial to creditors: Failure to amend schedule I for full employment information and failure to file
17 schedule I line 8a support statement.

18 The delay is unreasonable because the Debtor(s) is aware or should have been aware of these
19 requirements and the Trustee has previously requested these requirements be fulfilled.

20 Furthermore, the delay is prejudicial to creditors because disbursements cannot be made and
21 there is an automatic stay preventing collection efforts that would otherwise be available.

22 NOTICE IS HEREBY GIVEN that debtor or the attorney of record may request a hearing in
23 writing stating specific grounds for objecting to the dismissal or conversion of these proceedings to the
24 court and served on the trustee no later than twenty-one (21) days from the date of service of this motion.
25 Trustee will then schedule a hearing date and notice debtor and the attorney of record of said hearing
26 date.
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I declare under penalty of perjury that the foregoing is true and correct.

Date: August 11, 2015

/s/ Martha G. Bronitsky

Signature of Martha G. Bronitsky
Chapter 13 Standing Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have served a copy of the within and foregoing document on the debtor (s), counsel for debtor (s), and if applicable, the creditor, creditor representatives and the registered agent for the creditor by depositing it in the United States mail with first class postage attached thereto.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Wali As-Saboor Muhammad
1535 - 5Th Street
Richmond,CA 94801

Patrick L Forte Atty
1 Kaiser Plaza #480
Oakland,CA 94612

(Debtor(s))

(Counsel for Debtor)

Date: August 11, 2015

/s/ Rammet Munoz Rubio

Rammet Munoz Rubio